

Violation Number	Date SAR Filed	SAR Bates Stamp	Shell Company Involvement or Derogatory History of Stock	Court's Ruling	Shell status within one year not undisputed
197	4/24/2012	ALPINE00083273	SEC-ALPINE-E-1690740	Alpine was required to include information in the narrative if company was a shell company "within one year preceding the transaction." (pp. 67-71) (emphasis added). As a matter of law, Alpine also had a duty to include "derogatory information about the customer or issuer" in the SAR narrative, including whether a company website was not working, whether the company's SEC filings were not current, or frequent name changes.	Record is devoid of undisputed evidence that issuer is or was a shell company within one year of the transaction, or that the stock has a derogatory history.
1712, 1907	10/9/2014	ALPINE00092563	Shell company - ALPINE00280661 pg 2	Alpine was required to include information in the narrative if company was a shell company "within one year preceding the transaction." (pp. 67-71) (emphasis added).	Record is devoid of undisputed evidence that issuer is or was a shell company within one year of the transaction.